REMARKS/ARGUMENT

Claims 1-33 are pending in this application. Claims 1, 2, 8, 9, 14, 15, 20-22, 28-30, 32 and 33 stand rejected and claims 3-7, 10-13, 16-19, 23-27 and 31 are objected to. Applicant gratefully acknowledges the allowable subject matter in claims 3-7, 10-13, 16-19, 23-27 and 31. Applicant Acknowledges the renumbering of misnumbered claim 32. By this Amendment, claims 1, 11, 17 and 32 have been amended. The amendments made to claims 1, 11, 17 and 32 do not alter the scope of these claims, nor have these amendments been made to define over the prior art. Rather, the amendments to claims 1, 11, 17 and 32 have been made to improve the form thereof. In light of the amendments and remarks set forth below, Applicant respectfully submits that each of the pending claims is in immediate condition for allowance.

Applicant respectfully submits that each of the pending claims is in immediate condition for allowance.

Paragraph 4 of the Office Action rejects claim 33 under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification. Applicant respectfully requests withdrawal of this rejection. Applicant may rely upon the specification and claims as filed for disclosure. M.P.E.P. § 608. In establishing disclosure, applicants may rely on the specification, drawings, and original claims as filed. M.P.E.P. § 608.04. Claim 33, which depends from claim 15, recites a program product "carried on a medium". Support for this limitation can be found in claim 15 as originally filed by the Applicant.

The Office Action rejects claims 11, 17 and 32 under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In accordance with the Examiner's remarks, and to more

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clearly define the invention, Applicant has amended claims 11, 17 and 32. As a result, Applicant requests that the Examiner withdraw the rejection under 35 U.S.C. § 112.

Paragraph 9 rejects claims 1, 2, 8, 9, 14, 15, 20-22, 28-30, 32 and 33 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,067,082 ("Enmei"). Applicant respectfully traverses this rejection.

Among the limitations of claim 1 neither shown nor suggested by Enmei is a destination calling control apparatus having:

> input means for entering destination data corresponding to the destination image area ... data registration means for calculating coordinate data of said destination image area associating said coordinate data with the destination data and storing said associated data in said database ... and calling means for calling the destination based on the destination data and the destination area.

Enmei discloses a portable communicator where an image (a map) is stored in ROM 69. The map has road numbers and destinations. Additionally, guide routes can be determined from the map. (Column 29, lines 32-39). Thus, no destination data is input, only stored information is read from ROM 69. No destination data corresponding to the destination image area is input in Enmei using input means as explicitly recited in Applicant's claim.

Further, Enmei fails to disclose Applicant's claimed data registration means. The Office Action equates Applicant's "data registration means" with the guide route disclosed at column 30, lines 13-36. This portion of Enmei's disclosure discusses selecting coordinate data of a starting point and ending point and then calculating a route based on the start and end points. This is not the data registration means explicitly recited by Applicant that associates coordinate data with the destination data (telephone number) and

storing the associated data in the database. It should also be noted that the database discussed at column 3, line 42 is read-only memory 96 not a volatile memory as claimed by Applicant.

Claims 2, 8 and 29 depend from, and contain all the limitations of claim 1. These dependent claims also recite additional limitations which, in combination with the limitations of claim 1, are neither disclosed nor suggested by Enmei and are also believed to be directed towards the patentable subject matter. Thus, claims 2, 8 and 29 should also be allowed.

Thus, it is asserted that the rejection of claims 1, 2, 8 and 29, under 35 U.S.C. § 102 has been overcome. Reconsideration of the rejection of claims 1, 2, 8 and 29, under 35 U.S.C. § 102 is respectfully requested in light of the amendments and remarks above.

Independent claim 9 is a method claim similar in scope to apparatus claim 1. Claim 9 includes the limitations of "entering destination data corresponding to said destination image area ...associating said coordinate data with the destination data... and calling said destination corresponding to the destination data." Enmei does not disclose entering destination data as explicitly recited in Applicant's claim. Further, Enmei does not disclose associating the input data with coordinate data to facilitate calling the destination. As discussed above, Enmei discloses selecting a starting point and an end point and determining a route based on these points. Thus, claim 9 is allowable, as well as claim 14, which depends from claim 9.

Claim 15 is directed to a computer-readable program product configured to execute in a computer the method of claim 9. For the reasons discussed above, claim 9, and its dependent claims 14 and 33, are allowable over the prior art of record.

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Therefore, it is asserted that the rejection of claims 9 and 15, under 35 U.S.C. § 102 has been overcome. Reconsideration of the rejection of claims 9 and 15, under 35 U.S.C. § 102 is respectfully requested in light of the amendments and remarks above.

Independent claim 21 explicitly recites:

> an area specification unit configured to allow a user to specify a desired area within the image displayed on said display unit; an input unit for entering destination data; a data registration unit configured to calculate coordinate data of the area specified by said user area specification unit... [and] a destination data search unit configured to calculate the coordinates of the area specified by said area specification unit... and a calling unit calling the destination based on the destination data obtained by said destination data search unit.

As discussed above, Enmei does not disclose an input unit for entering destination data. The destination data referred to in Enmei is an actual physical location on a map to be used to determine a guide route. This is unlike Applicant's destination data that represents such items as telephone numbers. The destination data as explicitly recited in Applicant's claim is used to call the designated destination. There is no association of an area with this destination data as explicitly recited in Applicant's claim. Enmei relates to using GPS to select a driving route, not to dial a phone.

Claims 22-28 depend from, and contain all the limitations of claim 21. These dependent claims also recite additional limitations which, in combination with the limitations of claim 21, are neither disclosed nor suggested by Enmei(?) and are also believed to be directed towards the patentable subject matter. Thus, claims 22-28 should also be allowed.

Independent claim 30 is a method claim corresponding to apparatus claim 1 including the step of capturing image data. Claim 30 explicitly requires entering the

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destination data corresponding to a portion of an image which is unlike the selection of an area on a map disclosed by Enmei to determine a travel route as discussed above.

Therefore, it is asserted that the rejection of claim 30, under 35 U.S.C. § 102 has been overcome. Reconsideration of the rejection of claim 30, under 35 U.S.C. § 102 is respectfully requested in light of the amendments and remarks above.

Claim 32 requires "an input device for entering destination data corresponding to a portion of an image [and] associating said coordinate data with said destination data." Enmei does not disclose this feature of claim 32. In Enmei, a ROM 69 includes a map and other information associated with the map. In one embodiment, a portion of the map is associated with multiple other objects including telephone numbers. However, in Enmei there is no associating coordinate data with the input destination data as explicitly recited in Applicant's claim 32.

Therefore, it is asserted that the rejection of claim 32, under 35 U.S.C. § 102 has been overcome. Reconsideration of the rejection of claim 32, under 35 U.S.C. § 102 is respectfully requested in light of the amendments and remarks above.

Applicant has responded to all of the rejections and objections recited in the Office reconsideration and Notice of Allowance for all of the pending claims is therefore respectfully requested.

The amendments to the claims are for clarification purposes only and are not intended to limit the scope of the claims in any way. It is asserted that the present amendment places the application in a form for allowance. Entry of this amendment is therefore earnestly solicited.

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

Dated: December 31, 2002   Respectfully submitted,

By

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APPENDIX B
Version With Markings To Show Changes Made
37 CFR 1.121(b)(iii) AND (c)(ii)

CLAIMS (with indication of amended or new):

1.   (Amended)   A destination calling control system comprising:

a database;

an image storage for storing image data;

a display for displaying said image data;

area specification means for specifying a destination image area within an image displayed on said display;

input means for entering destination data corresponding to the destination image area;

data registration means for calculating coordinate data of said destination image area, associating said coordinate data with the destination data, and registering storing said associated data in said database; and

calling means for calling the destination based on the destination data and the destination area.

11.   (Amended)   The destination calling control methods as defined by claim 9, further comprising assigning a unique number on a numeric keypad to [said] a paste image, and displaying the destination image or the title image in response to the number of the numeric key that is pressed.

17.   (Amended)   The computer readable program product as defined by claim 15, further comprising:

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assigning a unique number on a numeric keypad to [each] a paste image, and displaying the paste image assigned to said numeric key in response to the number of the numeric key that is pressed.

32.   (Amended)   A destination calling apparatus comprising:

a memory for storing an image;

a display for displaying said image;

a selector for selecting a portion of said image;

an input device for entering destination data corresponding to said portion of said image;

a register for calculating coordinate data for said portion of said image, associating

said coordinate data with said destination data, and storing said associated data in said [store] memory;

a searcher for retrieving destination data based on coordinates of a portion of said

image selected by said selector; and

a calling device for calling using the destination data retrieved by said searcher.

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